UNFAIR COMPETITION — INTERFERENCE WITH ANOTHER'S SELLING SYSTEM. — The plaintiff was the originator and manufacturer of a toy consisting of strips of metal of various shapes and sizes, with which it was possible to build in miniature some of the more common mechanical contrivances. The toy was sold in "outfits," seven in all, each "outfit" fitting in with the previous ones purchased and increasing the possibilities of the toy. The defendant began its manufacture, making his "outfits" interchangeable with the plaintiff's and selling at a lower price than his rival. This resulted in a considerable falling off in the plaintiff's business, for which relief is now sought in the form of an injunction restraining the defendant from selling "outfits" interchangeable with the plaintiff's. *Decreed*, that the injunction issue. *Meccano, Ltd.* v. *Wagner*, 234 Fed. 912.

For a discussion of the principles involved, see NOTES, p. 166.

WILLS — CONSTRUCTION — RULE IN SHELLEY'S CASE — REMAINDER TO "ISSUE, SHARE AND SHARE ALIKE." — Land was devised to trustees to the testator's daughter for life, and then to "her issue, and if there be more than one, share and share alike." By statute fee tail is transformed into fee simple. *Held*, that the daughter takes a fee simple. *Bullen* v. *O'Leary*, 1916 Vict. L. R. 297.

The rule in *Shelley's Case* creates a fee tail where a life estate is followed by a remainder to the direct descendants of the life tenant in an indefinite line of inheritable succession. See SPITZ, CONDITIONAL AND FUTURE INTERESTS IN PROPERTY, 42. The rule was originally applicable only where the remainder was to "heirs of the body." It still applies wherever there is a remainder in these words. See CHALLIS, REAL PROPERTY, 3 ed., 153. For the words "heirs of the body" are conclusively presumed to denote an indefinite line of succession. In wills the rule has also been extended to certain other words equivalent in meaning. So it has been applied where there is a remainder to "issue." *Bowen* v. *Lewis*, L. R. 9 A. C. 890. See CHALLIS, REAL PROPERTY, 3 ed., 164. In England, as in the principal case, the rule has been held applicable in wills to such other words, even where the context clearly shows that they are intended to designate particular individuals and not an indefinite line of succession. *Van Grutten* v. *Foxwell*, [1897] A. C. 658; *Roddy* v. *Fitzgerald*, 6 H. L. C. 823. *Contra*, *Montgomery* v. *Montgomery*, 3 Jo. & La T. 47. An analogous problem has also arisen in wills as to what words constitute words of limitation so as to create a fee tail directly, without the use of Shelley's rule. In that case, although words other than "heirs of the body" may be considered words of limitation and so may create an estate tail, yet they do not create such an estate, if it appears that they were meant to be words of purchase. See SMITH, EXECUTORY INTERESTS, 248. In other words, except where the technical words "heirs of the body" are used, the intention is held to govern. The same principle is applied in America to Shelley's rule. So where, as in the principal case, words other than "heirs of the body" are used with a clear intent for a remainder to definite individuals and not to an indefinite line, the rule is held not applicable. *Kemp* v. *Reinhard*, 228 Pa. 143, 77 Atl. 436; *Mallery* v. *Dudley*, 4 Ga. 52; *In re Daniel Utz*, 43 Cal. 200.

WITNESS — PRIVILEGE AGAINST SELF-INCRIMINATION — APPLICATION TO COMPULSORY STATEMENTS OUT OF COURT. — The defendant was convicted of violating a statute requiring an operator of a motor car who knows that he has injured a person to return to the scene of the accident and give his name, address, and license number to any proper person demanding the same. N. H. LAWS 1911, ch. 133, § 20. The Constitution of New Hampshire provides that "no subject shall . . . be compelled to accuse or furnish evidence against himself." BILL OF RIGHTS, Art. 15. *Held*, that the statute is constitutional. *State* v. *Sterrin*, 98 Atl. 482 (N. H.).